

LAWLER, METZGER & MILKMAN, LLC

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December 3, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

BY HAND

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W. - Suite TW-A325  
Washington, D.C. 20554

Re: Bell Atlantic – New York Section 271 Application, CC Docket No. 99-295  
Allegiance Petition for Expedited Rulemaking, RM 9474

Dear Ms. Salas:

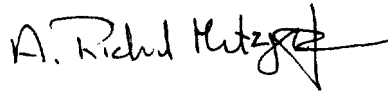
On December 2, 1999, Royce Holland, Chairman and Chief Executive Officer, Allegiance Telecom, Inc. (Allegiance), Robert McCausland, Vice President, Regulatory and Interconnection, Allegiance, and Richard Metzger, Lawler, Metzger, and Milkman, LLC, counsel to Allegiance, met with the following to discuss Allegiance's views on certain of the issues pending before the Commission in the above-referenced proceedings: Commissioner Harold Furchtgott-Roth and Helgi Walker, Senior Legal Advisor to Commissioner Furchtgott-Roth; Commissioner Michael Powell and Kyle Dixon, Legal Advisor to Commissioner Powell; and Commissioner Gloria Tristani and Sarah Whitesell, Legal Advisor to Commissioner Tristani. The views expressed by Messrs. Holland, McCausland and Metzger are set forth in Allegiance's written comments in the above-referenced proceedings as well as the enclosed document, which was provided to the attendees during these meetings.

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Pursuant to section 1.1206(b)(1) of the Commission's rules, 47 C.F.R.  
§1.1206(b)(1), an original and one copy of this letter and enclosure are being provided to  
you for inclusion in the public record of each of the above-referenced proceedings.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Richard Metzger, Jr.", with a stylized flourish at the end.

A. Richard Metzger, Jr.

Enclosure

cc:	Commissioner Furchtgott-Roth	Helgi Walker
	Commissioner Powell	Kyle Dixon
	Commissioner Tristani	Sarah Whitesell

Allegiance Telecom, Inc.

Bell Atlantic-New York  
Section 271 Application

CC Docket No. 99-295

December 2, 1999



*allegiancetelecom, inc.*

# SUMMARY:

- Bell Atlantic-New York Should Be the First 271 Application Approved
- Commission Should First Require Bell Atlantic to Fix Discrete Outstanding Performance Problems -- Trunking, Transport, Loops, and Hot Cuts
- Any Order Approving the Application Should Contain Stringent Anti-Backsliding Measures



*allegiancetelecom, inc.*

ALLEGIANCE RECOMMENDS A  
THREE-TIERED ANTI-BACKSLIDING  
PENALTY APPROACH:

- 1) Tier 1 : Impose UNE Price Reductions
- 2) Tier 2 : Suspend A Backsliding RBOC's  
Authority To Sell In-Region InterLATA LD  
Without Affecting Existing Customer Services
- 3) Tier 3 : Impose Substantial Fines



*allegiancetelecom, inc.*

CONSUMERS NEED “CUSTOMER  
LIBERATION” FRESH LOOK  
OPPORTUNITIES UNTIL ILEC MARKET  
DOMINATION HAS ENDED:

T-1 Based Local Service Examples  
Include:

- Digital PBX Trunks
- PRIs
- ISDN Lines



*allegiancetelecom, inc.*